

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ALBERT PINEY <i>et al.</i> , individually and on behalf all others similarly situated,  Plaintiffs,  v.  CITY OF NEW YORK, <i>et al.</i>  Defendants.	No.: 1:25-cv-00671-DEH-SLC
MOHAMED MONASAR, <i>et al.</i> , individually and on behalf of all others similarly situated,  Plaintiffs,  v.  CITY OF NEW YORK, <i>et al.</i>  Defendants.	No.: 1:25-cv-01337-LJL
SCOTT DEFALCO, <i>et al.</i> , individually and on behalf all others similarly situated,  Plaintiffs,  v.  CITY OF NEW YORK, <i>et al.</i> ,  Defendants.	No.: 1:25-cv-01339-KPF

**NOTICE OF *PINEY* PLAINTIFFS'  
MOTION FOR CONSOLIDATION AND  
APPOINTMENT OF INTERIM CLASS COUNSEL**

PLEASE TAKE NOTICE that on a date and time determined by the Court, before the Honorable \_\_\_\_\_, United States District Judge, at the United States District Court for the Southern District of New York, located at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, Plaintiffs Albert Piney, Roman Diaz, Jose Martinez, Freddy Suazo, Desmond Grant, M. Mostayen Faysal, Sophia Daly, Charlie Ruiz-Reyes, James Divino, Michael Kmiotek, Devon Dawkins, Alexis Yanez, Julio Rosa, Jaynel Pantoja, Claudio Diaz, Dominique Eveillard, Sudan Osorio, Randy Chow, and Jorge Zorrilla (“*Piney* Plaintiffs”), through the undersigned counsel, will respectfully move this Court for entry of an Order:

- (1) consolidating the above-captioned actions pursuant to Fed. R. Civ. P. 42(a);
- (2) designating the Second Amended Complaint (ECF No. 91) in this *Piney* Action as the operative Complaint for the consolidated action;
- (3) appointing Faruqi & Faruqi, LLP Interim Class Counsel pursuant to Fed. R. Civ. P. 23(g); and
- (4) granting any further relief as the Court may deem just and proper.

This Motion is supported by the accompanying Memorandum of Law, the Declaration of Innessa M. Huot filed herewith and all exhibits attached thereto, and the pleadings and other filings herein.

Dated: February 28, 2025  
New York, New York

Respectfully submitted,

s/ Innessa Huot  
Innessa M. Huot  
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*Attorneys for Plaintiff, the FLSA  
Collective, and the proposed Class*